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## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

VS.

KAREN CHAPON,

Defendant.

Case No. 2:20-CR-00286-JCM-NJK

**MOTION TO WITHDRAW AS  
COUNSEL AND REQUEST FOR  
APPOINTMENT OF CONFLICT-  
FREE COUNSEL  
(Expedited treatment requested)**

On behalf of the Defendant, Karen Chapon, Assistant Federal Public Defender Brian Pugh, files this Motion to Withdraw as Counsel and Request for Appointment of Conflict-Free Counsel, and states the following:

On October 4, 2023, undersigned counsel learned of a conflict of interest in continuing to represent Ms. Chapon. Undersigned counsel investigated and researched the nature of the conflict before filing this motion.

Disclosure of the conflict would violate Ms. Chapon's attorney-client privilege; however, the Federal Public Defender's Office has staffed the purported conflict and has concluded that a conflict in this matter does in fact exist regarding the continued representation of Ms. Chapon. The conflict prevents undersigned counsel and the Office of the Federal Public Defender of Nevada

1 from providing zealous, conflict-free representation during all stages of Mr. Chapon's  
2 criminal proceedings.

3 Because of the conflict of interest, undersigned counsel moves to withdraw  
4 immediately as counsel. In addition, undersigned counsel requests immediate appointment of  
5 independent, conflict-free counsel for Ms. Chapon.

6 Undersigned counsel does not file this motion lightly. Nor is he filing this motion for any  
7 improper purpose or to delay. Rather, counsel is concerned about the need to appoint conflict-  
8 free counsel as soon as possible because sentencing in this case is scheduled for November 29,  
9 2023. ECF No. 118.

10 The undersigned is mailing a copy this motion to Ms. Chapon today as required by LR  
11 IA 10-6(b).

12 Conclusion

13 A conflict in this matter exists regarding the continued representation of Ms. Chapon. The  
14 conflict prevents undersigned counsel and the Office of the Federal Public Defender of Nevada  
15 from providing zealous, conflict-free representation during all stages of Ms. Chapon's  
16 criminal proceedings.

17 In light of the conflict of interest, undersigned counsel requests permission to  
18 withdraw immediately as counsel and requests the immediate appointment of independent,  
19 conflict-free counsel for Ms. Chapon.

20 Respectfully submitted this 4th day of October, 2023.

21 RENE L. VALLADARES  
22 Federal Public Defender

23 By /s/ Brian Pugh  
24 BRIAN PUGH  
Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,  
5 v.  
6 KAREN CHAPON,  
7 Defendant.

Case No. 2:20-CR-00286-JCM-NJK

**ORDER**

8  
9 IT IS THEREFORE ORDERED that the foregoing Motion to Withdraw as Counsel and  
10 Request for Appointment of Conflict-Free Counsel is hereby GRANTED.

11 Dated October 6, 2023.

12   
13 UNITED STATES DISTRICT JUDGE  
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